



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

January 7, 2000

Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

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Re: File No. NSD-L-99-90, Petition of the Missouri Public Service Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Methods for the 314, 417, 573, 636, 660 and 816 Area Codes and CC Docket No. 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

Enclosed please find one original and four copies of the Connecticut Department of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard

Louise Rickard
Acting Executive Secretary

Enc.

cc: Al McCloud (2)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
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Petition of the Missouri Public Service Commission)	File No.
for Delegation of Additional Authority to Implement)	NSD-L-99-90
Number Conservation Methods for the 314, 417, 573,)	
636, 660 and 816 Area Codes)	
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Implementation of the Local Competition Provisions)	CC Docket No.
of the Telecommunications Act of 1996)	96-98

COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

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COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the Missouri Public Service Commission's (MPSC) Petition for Additional Delegated Authority to Implement Number Conservation Measures (Petition). Specifically, MPSC requests authority to: (1) institute thousands-block pooling trials; (2) establish usage thresholds; (3) reclaim unused and reserved NXX codes, and portions of those codes; (4) establish numbering allocation standards; (5) require sequential number assignment; (6) hear and address claims of carriers seeking numbering resources outside of the rationing process; (7) maintain rationing procedures for six months following area relief; (8) require the submission of utilization data from all carriers; (9) implement NXX code sharing; and (10) audit carriers' use of number resources. Petition, pp. 3 and 4.

II. Discussion

On November 1, 1999, MPSC petitioned the Commission requesting that it be provided the authority to implement various area code optimization measures in the State of Missouri. MPSC states that the State of Missouri is experiencing a rapid exhaustion of numbers similar to the problems experienced in other states. MPSC also states that in 1996 a geographic split of the 314 numbering plan area (NPA) was implemented by adding the 573 NPA producing an additional 250 NXX codes for the St. Louis area. Nevertheless, as more telecommunications service providers have entered the Missouri market along with a growth in the subscription of second lines, cellular service, paging, residential and business service continued in the 314 NPA, it was necessary for the MPSC to initiate a second geographic split of the 314 NPA. The new split will add the 636 NPA and will take affect in February 2000. Additionally, the MPSC implemented a geographic split in the 816 NPA this year due to number exhaustion in Kansas City and the surrounding area. Despite these recent geographic splits, the MPSC received notice from the North American Numbering Plan Administration (NANPA) that it has already begun scheduling industry meetings to begin additional relief planning for the 314 NPA and the 816 NPA. According to the MPSC, number exhaustion continues in Missouri at a rapid pace and additional numbering authority is necessary. Petition pp. 2 and 3.

CTDPUC supports the Petition and recommends that it be adopted by the Commission. MPSC has requested Commission authority to implement several

area code conservation measures that it believes will address the state's existing number crisis.

In particular, MPSC has requested that it be delegated the authority to implement several optimization measures that seek to address the telephone number crisis in Missouri. The Petition should be approved because MPSC is in a better position to determine what is in the best interest of Indiana. CTDPUC believes that these proposals when collectively implemented, should provide an orderly approach to assign telephone numbers in a more efficient manner and prolong the introduction of new NPAs in Missouri. CTDPUC notes that a number of MPSC's proposed conservation measures have been adopted and are in use in other jurisdictions. For example, MPSC has requested authority to implement mandatory thousand number block pooling. Authority to implement mandatory thousand block number pooling has already been delegated to the States of New York, Massachusetts, California, Connecticut and Florida. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks), is clearly the underlying factor creating the NPA shortage today. Mandatory thousand block number pooling would provide for a more efficient use of telephone numbers and minimize the wasteful allocation of these limited resources. MPSC should be afforded the same opportunity as was previously provided in the above noted states.

CTDPUC also supports MPSC's request for authority to enforce current standards for number allocation, establish usage thresholds and require sequential number assignment. While providing MPSC with the ability to

establish criteria for the acquisition and utilization of numbering resources, such authority should also provide MPSC and the North American Numbering Plan Administrator with more stringent assignment guidelines and require carriers to maximize fill rates before seeking additional NXXs.

CTDPUC similarly supports MPSC's request for the ability to implement NXX code sharing. Moreover, CTDPUC supports MPSC's request for the ability to order carriers to return unused and reserved NXX codes. Given the need for numbers and surplus of previously assigned numbers, a requirement that carriers return any unused blocks of numbers in NXX codes should also be adopted as a means of slowing down the unnecessary assignment of numbers. Adoption of these measures alone should minimize the occurrence of code holders possessing excess number reserves.

Moreover, CTDPUC supports MPSC's request for the ability to order number utilization and forecast reporting as well as the ability to audit such reporting. Clearly, forecast reporting by all providers will provide MPSC with the ability to monitor usage and advance the implementation of any additional number allocation standards. Likewise, effective auditing is necessary to ensure compliance with current industry guidelines and to determine that only those applicants with bona fide needs for additional numbering resources receive them. Auditing is also necessary to ensure that numbering resources are being used in an efficient and effective manner.

CTDPUC also believes that MPSC should be provided with the ability to hear and address claims of carriers seeking numbering resources outside of the

rationing process as well as maintain rationing procedures for six months following area relief. Delegation of such authority to MPSC would be consistent with authority provided to the states of Pennsylvania and California. MPSC should be afforded the same authority.

III. Conclusion

MPSC has offered the Commission several area code optimization measures, that if adopted as proposed, would provide MPSC with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide MPSC with the flexibility to implement a number of optimization measures and provide it with the ability to impose stricter

requirements on those seeking codes requiring a more efficient use of the codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC
UTILITY CONTROL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

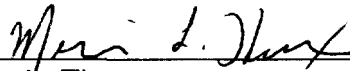
John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

January 7, 2000

Connecticut Department of
Public Utility Control
Ten Franklin Square
New Britain, CT 06051

CERTIFICATION

A handwritten signature in black ink, appearing to read "Miriam L. Theroux", is written over a horizontal line.

Miriam L. Theroux
Commissioner of the Superior Court